

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

MIGENA GJONAJ,

Plaintiff,

v.

**C & R MAINTENANCE, INC. d/b/a
RIZZO SERVICES, CHARLES RIZZO, SR.
And CHARLES RIZZO, JR.,**

Defendants.

Case No.: 2:08-CV-10315

Honorable Paul D. Borman

Referral MJ: Steven D. Pepe

MILLER COHEN, P.L.C.

Bruce A. Miller (P17746)

Robert F. Fetter (P68816)

Counsel for Plaintiff

600 West Lafayette Blvd - 4th Floor

Detroit, Michigan 48226

(313) 964-4454/964-4490 fax

SCHWARTZ LAW FIRM

Jay A. Schwartz (P45268)

Susan Leigh Brown (P41128)

Attorneys for Defendants

37887 West Twelve Mile Rd. – Suite A

Farmington Hills, Michigan 48331

(248) 553-9400

STIPULATED PROTECTIVE ORDER

This matter having come before the Court by way of the Stipulation entered onto by the parties;

The parties, by and through counsel, agree and stipulate that all medical records and tax information that Defendants or their attorney obtains or utilizes through the course of the litigation will be used for the purposes of this litigation only.

Defendants or its attorneys will not disclose any medical or tax information to any third party unless there is prior approval of Plaintiff's attorney or Plaintiff's attorney is present. Any third party that is given any medical or tax information in this litigation will

be informed of the existence of this protective order and informed that under no circumstances shall the medical or tax information be further disclosed or discussed.

The Parties further agree to redact Plaintiff's social security number from any Records utilized in this litigation.

If a party submits any tax or medical information to this Court, it will do so only under protective seal. At the conclusion of this litigation, the party in possession of medical records or tax information agrees to return all such documents, including copies, to opposing counsel of record.

IT IS SO ORDERED.

s/Paul D. Borman
PAUL D. BORMAN
UNITED STATES DISTRICT JUDGE

Dated: April 10, 2008

CERTIFICATE OF SERVICE

Copies of this Order were served on the attorneys of record by electronic means or U.S. Mail on April 10, 2008.

s/Denise Goodine
Case Manager

Agreed as to form and substance:

s/Robert D. Fetter
Robert D. Fetter (P68816)
Attorney for Plaintiffs

s/Susan Leigh Brown w/consent
Susan Leigh Brown (P41128)
Attorney for Defendants